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November 17, 2017

Via ECF and Facsimile

The Honorable George B. Daniels
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1310
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
(All Actions): Request for Extension of Time To Submit Replies in Support
of Motions To Dismiss

Dear Judge Daniels:

I write on behalf of the Kingdom of Saudi Arabia (“Saudi Arabia”) to request an extension of time until January 4, 2018, for Saudi Arabia and the Saudi High Commission (“SHC”) to submit replies in support of their motions to dismiss. We have conferred with counsel for the SHC, and I am authorized to state that the SHC joins in this request.

As noted in Mr. Kreindler’s October 11 letter to the Court, Saudi Arabia and the SHC previously indicated that they would request a deadline for their reply briefs after reviewing Plaintiffs’ opposition papers. ECF No. 3752. We have now completed that review. Plaintiffs’ opposition filings include 138 pages of legal memoranda; 9 affidavits, affirmations, and declarations not previously filed with the Court, adding up to a total of 295 pages; and 447 other exhibits, adding up to a total of 3,807 pages. Saudi Arabia and the SHC respectfully submit that an extension until January 4, 2018, is necessary to provide adequate time for an appropriate response to that volume of material.

This is the first extension of time that Saudi Arabia and the SHC have requested for their replies. For the initial motions to dismiss, Saudi Arabia and the SHC requested and Judge Netburn granted one extension of time, from June 1 to August 1, based on the filing of a new complaint in the *Ashton* cases. ECF No. 3514, at 1, 3-4. For the oppositions, Plaintiffs requested and your Honor granted two extensions of time, from October 1 to November 2, and then to November 9. ECF Nos. 3688, 3753. Saudi Arabia and the SHC consented to each of Plaintiffs’ requests. ECF No. 3684, at 1; ECF No. 3753.

This Court has set a hearing on Saudi Arabia’s and the SHC’s motions for January 18, 2018. Saudi Arabia and the SHC do not request any change in that hearing date. The requested

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reply date of January 4 would leave two weeks between the end of briefing and the hearing, which should allow the Court and the parties sufficient time to review the replies and prepare.

We have conferred with counsel for Plaintiffs to obtain their positions on Saudi Arabia's and the SHC's request. The *Ashton* Plaintiffs consent. The CAC Plaintiffs do not oppose but have asked us to inform the Court that they expect to write to the Court early next week concerning the arguments scheduled for January 18, 2018, once they have heard back from all of the non-sovereign Defendants on a proposal that was circulated on November 16, 2017 concerning the date of argument on their motions.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg

cc: The Honorable Sarah Netburn (via ECF)
All MDL Counsel of Record (via ECF)